



KINGSGATE CHURCH ANTI-SLAVERY AND HUMAN TRAFFICKING POLICY

Review Date: September 2025
Next Review Date: August 2027

INTRODUCTION

The following pieces of legislation are relevant to this policy:

- Modern Slavery Act 2015.
- Human Trafficking and Exploitation (Criminal Justice and Support for Victims) Act (Northern Ireland) 2015. This has led to the implementation of the Nordic Model in Northern Ireland.
- Criminal Justice (Scotland) Act 2003.
- Asylum and Immigration (Treatment of Claimants, etc.) Act 2004.
- Criminal Justice and Licensing (Scotland) Act 2010.

Modern slavery encompasses the abuse/exploitation of vulnerability. It takes many forms, each involving the control and exploitation of individuals for personal or commercial gain. While it may look different depending on the context, the common thread is the denial of freedom and the use of coercion, deception, or abuse of power for the purpose of exploitation.

Under the **Modern Slavery Act 2015**, the following types of abuse fall within this umbrella term:

1. **Slavery, Servitude, and Forced or Compulsory Labour** (*Section 1 MSA*) Where individuals are forced to work under threat, coercion, or control, with no real ability to leave.
2. **Human Trafficking** (*Section 2 MSA*) The intentional movement of a person for the purpose of exploitation.

This movement does not need to cross borders and may be as limited as moving someone from one room to another.

Consent is irrelevant where deception, force, or coercion are involved.

3. **Exploitation linked to human trafficking and modern slavery can include:**

- Sexual Exploitation: Coercing individuals into performing sexual acts for the benefit of others. Victims are often controlled through violence, threats, or psychological manipulation and may be trafficked specifically for this purpose.
- Removal of Organs: Trafficking individuals for illegal organ harvesting.
- Forced Criminality: Coercing individuals into criminal acts such as drug cultivation, theft, or fraud, sometimes as part of a debt-bondage process.
- Securing Services by Force, Threats, or Deception: Forcing someone to provide labour or services through manipulation, violence, or intimidation.

CHILD SEXUAL EXPLOITATION

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs when an individual or group coerces, manipulates, or deceives a child or young person under the age of 18 into sexual activity, either in exchange for something (e.g., gifts, money, status, protection, or attention) or under threat or pressure.

CSE may occur in person, online, or through a combination of both. While some cases involve organised groups or gangs, others are perpetrated by individuals, including those known to the child.

Perpetrators may use grooming techniques such as drugs, alcohol, flattery, or gifts to gain the child's trust or control. Regardless of the method, a child cannot consent to abuse. The law is clear that a child under the age of 18 cannot consent to sexual exploitation or abuse.

Under Article 3 of the Palermo Protocol, the recruitment, movement, or harbouring of a child for the purpose of exploitation is automatically considered trafficking—even if no

force, coercion, or deception is involved. This reinforces that any involvement of a child in exploitative sexual activity is a serious criminal offence, regardless of how it occurs. As this form of abuse relates specifically to children and young people, KingsGate Church's Safeguarding Policy includes procedures for identifying, reporting, and responding to any concerns or disclosures related to CSE.

KINGSGATE'S COMMITMENT

KingsGate Church is committed to ensuring that there is no slavery, servitude, forced or compulsory labour, human trafficking, abuse of power over vulnerable individuals, or any other form of exploitation as defined by the Modern Slavery Act (MSA), within our church or supply chain, as far as is reasonably within our control.

This commitment applies to internal operations, including recruitment, employment, and working conditions; and external relationships, including suppliers, contractors, service providers, and business partners.

KingsGate Church recognises that modern slavery can occur within supply chains and external relationships, and we are committed to addressing this issue within our own operations and those of our partners. We expect all suppliers, contractors, and service providers to comply with the **Modern Slavery Act 2015** and uphold ethical labour practices.

Key measures:

- Identify risks based on physical factors e.g. location, type of labour; and relational factors e.g. power imbalances.
- Focus attention on high-risk and vulnerable groups.
- Educate employees and managers to recognise signs of exploitation.
- Promote a culture of ethical conduct and accountability.
- Provide safe channels for raising concerns (e.g. whistleblowing).
- Investigate issues promptly and act to support victims and rectify harm.
- Ensuring suppliers and partners have policies and procedures in place to prevent modern slavery and exploitation.
- Monitoring and reviewing contracts and relationships with third parties to ensure compliance with the Modern Slavery Act.
- Regularly assessing the risk of modern slavery in supply chains, especially where there are higher risks due to geographic locations, sectors, or the nature of the services provided.

We recognise that we cannot fully control external behaviours, particularly those of suppliers or outsourced partners, and that risks may remain hidden due to fear, isolation, or coercion. However, based on our current knowledge, resources, and practical influence, we are committed to taking all reasonable and proportionate steps to prevent and address modern slavery.

While we cannot guarantee its complete absence, we will regularly review our practices, collaborate with partners to enhance ethical standards, and take swift action to address any identified issues in our supply chain. Prompt and appropriate steps will be taken to mitigate risks and rectify any harm.

RECRUITMENT INDICATORS OF MODERN SLAVERY

During the recruitment process, KingsGate Church performs appropriate checks, in accordance with relevant laws, on prospective employees. Refer to the KingsGate Safer Recruitment policy for more information.

We intend to implement effective systems and controls to ensure that modern slavery does not take place, in accordance with our commitment to acting ethically and with integrity in all our relationships.

KingsGate Church is committed to reinforcing and communicating effectively, regards all policies that reflect our values and principles and we expect all persons involved in the charity to adhere to.

INDICATORS OF MODERN SLAVERY AND EXPLOITATION:

The following are potential indicators of modern slavery, exploitation, or coercive control, and should be taken seriously within any safeguarding or whistleblowing framework:

- Individuals not being paid fairly or at all for the work they undertake.
- Individuals being held in debt bondage, for example, being told they still owe money after having already repaid a debt.
- A person's passport or identity documents being withheld by their employer or controller to restrict their freedom.
- Multiple benefit claimants having their welfare payments deposited into a single bank account, potentially indicating exploitation or abuse.
- Restricted freedom of movement, such as not being allowed to leave the workplace or having travel documents confiscated.
- Clear exploitation of an individual, whether for financial, labour, or sexual gain.
- Cuckooing, where the home of a vulnerable person is taken over by others, often linked to drug dealing or other criminal activity. The occupant may be threatened, coerced, or manipulated into allowing this.
- Criminal exploitation by organised criminal groups (OCGs), including grooming and coercing children or vulnerable adults to engage in criminal activities such as drug trafficking, theft, or county lines operations. These individuals are victims of exploitation, even if they appear to be involved in illegal activity.
- Grooming for criminal purposes, where individuals, particularly children, are manipulated or threatened into committing crimes on behalf of others, often through false promises, fear, or emotional control.

Under the **Modern Slavery Act 2015**, we are required to ensure that we do not have any aspect of modern slavery, exploitation, or trafficking within KingsGate Church or its connected activities. Anyone identified as being subjected to criminal exploitation must be recognised as a victim, and safeguarding processes should respond accordingly.

CONCERNS OR SUSPICIONS

KingsGate is committed to safeguarding vulnerable individuals. While we respect each person's autonomy and right to confidentiality, we are legally and ethically obligated to act when there are concerns of modern slavery or exploitation.

Victims may be fearful, isolated, or under the control of others, and may not consent to having their information shared or the situation reported. KingsGate will always approach these situations with sensitivity and care, while also fulfilling our duty to protect individuals from harm.

If staff or volunteers within KingsGate have any suspicions or concerns that any form of modern slavery may be occurring, they must take the below course of action:

1. If someone is at **immediate risk of harm**, call emergency services on **999** without delay. This includes situations where there is an active threat to life or safety.

2. Any suspicion, disclosure, or concerns must immediately be reported to Karen Reekie, our Safeguarding Officer by telephoning the office on 020 8948 3355 or by email at safeguarding@kingsgatechurch.org.uk. Karen will lead on safeguarding actions, assess the situation, and coordinate any necessary referrals or reports.

All information will be handled confidentially and only shared with relevant individuals or agencies on a need-to-know basis in order to protect those at risk.

3. Referral Pathways:

- a. If the individual **consents** to be referred and you are a First Responder (e.g., police or local authority), you can directly initiate the **National Referral Mechanism (NRM)**.

Victims referred into the NRM may receive access to safe housing, legal support, medical care, and other victim-centered services such as access to interpreters and caseworkers.

- b. If you are not a First Responder, contact the **Modern Slavery Helpline (08000 121 700)** for support. They can guide you through the process and help you connect with an appropriate First Responder to initiate the referral.

4. If the individual does **not consent** to a formal referral, KingsGate will:
 - explain the risks of not engaging with formal support, including potential harm or continued exploitation;
 - not pressure or coerce the individual, but will respect their choice; and
 - ensure that they are still connected with appropriate local support services and continue to offer pastoral care, advice, and guidance as needed.

Note that there is often a reluctance on the part of the “victim” to engage with agencies or individuals who raise concerns, particularly if the perpetrator is present. Therefore, it is imperative that those identifying and reporting concerns, remain calm and provide reassurance.

SUPPORT RESOURCES

Below are the official resources to report concerns or seek immediate advice, support, and information on what to do next.

- **Modern Slavery & Exploitation Helpline** run by **Unseen UK**
Provide a secure online platform offering information, advice, and support - where concerns can be reported anonymously. They can also be contacted on 08000 121 700
- **Kingston Councils** contact telephone numbers:
 - Adult at Risk: 0208 547 5005
 - Child at Risk: 0208 547 5008
 - Out of Hours Support: 0208 770 5000
- **UK Government Modern Slavery Collection**
A comprehensive set of guidance documents, policies, and tools related to modern slavery and human trafficking.
- **Statutory Guidance: Identifying and Supporting Victims**
This guidance outlines the responsibilities of organisations and professionals in identifying and supporting victims of modern slavery.

KingsGate Church will regularly review and update its policies and practices to ensure that all steps are in place for safeguarding and supporting those affected by modern slavery, trafficking, and exploitation.